

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STUDENTS FOR FAIR ADMISSIONS,
INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

*****The attached envelope contains a letter
subject to a Protective Order of this Court and
cannot be opened or its contents made available
to anyone other than counsel of record for the
parties or Court personnel.*****

PLAINTIFF'S MOTION TO IMPOUND

Pursuant to Local Rule 7.2 and this matter's Stipulated Protective Order (Dkt. No. 55), Plaintiff, Students for Fair Admissions, Inc. ("SFFA"), hereby brings this motion to give this Honorable Court the option to impound the enclosed unredacted letter from Plaintiff's counsel to Judge Burroughs dated January 27, 2016 (the "Letter"). The Letter contains the identity of database fields and other information which have been designated by Defendant, the President and Fellows of Harvard College ("Harvard") as "protected material" under the Stipulated Protective Order. This motion is brought in reaction to Harvard's designations. A redacted version of the Letter has been publicly filed in which discussion and references to the designated "protected material" that has not previously been disclosed by Harvard were redacted.

WHEREFORE, SFFA respectfully submits this motion which gives the Court the option to allow the unredacted version of the Letter to be impounded and to be viewed only by the Judge, her clerk(s) and Court personnel.

Respectfully submitted,

By: /s/ Patrick Strawbridge
Patrick Strawbridge

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Dated: January 27, 2016

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Counsel for Plaintiff Students for Fair Admissions, Inc.

CERTIFICATE OF CONFERENCE

In accordance with Local Rules 7.1(a), I hereby certify that this motion is brought in reaction to Harvard's designation of certain database fields and other information as "protected material" under the Stipulated Protected Order. The issues presented in the Letter encompass areas of dispute which the parties have previously briefed or which they have reached an impasse after conferring as required by L.R. 7.1(a)(2).

/s/ Patrick Strawbridge
Patrick Strawbridge

CERTIFICATE OF SERVICE

In accordance with Local Rule 5.2(b), I hereby certify that this document was filed through the Court's ECF system on January 27, 2016 and will be sent electronically to the registered participants identified on the Notice of Electronic Filing. The attachment to this motion was delivered to the Court in a sealed envelope.

/s/ Benjamin C. Caldwell
Benjamin C. Caldwell

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